UNITED STATES DISTRIC COURT DISTRICT OF MINNESOTA

Case No. 22-cv-1589 NEB-JFD

Woodstone Limited Partnership; Lofts at Farmers Market LLC,

Plaintiffs,

v.

City of Saint Paul, Minnesota, a Minnesota Charter City; City Council of the City of Saint Paul; Angie Wiese, in her official capacity as the Director of the Department of Safety and Inspections of the City of Saint Paul; Mayor Melvin Carter, in his official capacity as Mayor of the City of Saint Paul; and John Doe,

> Defendants And

Katherine Banbury, Angela Wilhight, Westside Community Organization, Alliance for Metropolitan Stability, HOME line,

Defendant-Intervenors

Notice of Motion for Leave to tile Amicus Memorandum of Katherine Banbury, Westside Community Organization, Alliance for Metropolitan Stability, and HOME Line.

TO: Plaintiffs Woodstone Limited Partnership and Lofts at Farmers Market LLC and their attorneys Joseph W. Anthony, Philip J. Kaplan, Kathryn E. Campblee, Anthony Ostlund Louwagie Dressen & Boylan P.A. 90 S. Seventh St., Minneapolis, MN 55402.

Defendants City of Saint Paul, Minnesota, City Council of the City of Saint Paul, Angie Wiese, in her official capacity as the Director of the Department of Safety and Inspections of the City of Saint Paul, Mayor Melvin Carter, in his official capacity as Mayor of the City of Saint Paul, and John Doe, and their attorneys, Megan D. Hafner and Kyle Citta, SAINT PAUL CITY ATTORNEY'S OFFICE, 750 City Hall and Court House, 15 West Kellogg Boulevard, Saint Paul, Minnesota 55102.

PLEASE TAKE NOTICE that on a date to be determined by the Court, before

the Honorable Nancy E. Brasel, United States District Court, 13W U.S. Courthouse, 300 South Fourth Street, Minneapolis, Minnesota 55415, Prospective Amici Katherine Banbury, Westside Community Organization, Alliance for Metropolitan Stability, and HOME Line will move the Court for Leave to file the attached Amicus Memorandum.

Dated: November 28, 2022 HOUSING JUSTICE CENTER

/s John Cann_

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Attorneys for Prospective Amici